

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

David Glenn Perez Jr.

Case No. 1:24-mj-30227

Judge: Morris, Patricia T.

Filed: 06-12-2024

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 7/10/23 (Ct1) and 6/8/24 (Ct2) in the county of Isabella in the Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

COUNT 1) 18 U.S.C. §§ 2242(2), 1153

COUNT 2) 18 U.S.C. §§ 2244(a)(1), 1153

1) Defendant, an Indian, within Indian country, knowingly engaged in a sexual act with C.P., that is, contact between the penis and vulva, while C.P. was incapable of appraising the nature of the conduct and while C.P. was physically incapable of declining participation in, or communicating unwillingness to engage in, the sexual act, in violation of 18 U.S.C. §§ 2242(2) and 1153;

2) Defendant, an Indian, within Indian country, knowingly engaged in sexual contact with W.A., that is, he intentionally touched W.A.'s genitalia through the clothing with the intent to abuse, humiliate or arouse the sexual desire of any person through the use of force, in violation of §§ 2242(2)(c) and 1153.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.



Complainant's signature

Off. Nick Diedrich, BIA

Printed name and title



Judge's signature

Sworn to before me and signed in my presence.

Date: 06/12/2024

City and state: Bay City, Michigan

Patricia T. Morris, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT
FOR DAVID GLENN PEREZ JR.**

I, Nick Diedrich, being duly sworn, depose and state:

1. I am a officer with the BIA. I have been a law enforcement officer for approximately 15 years. During my career I have been involved in numerous investigations concerning sexual assault. The following is based on a statement from witnesses and statements from other law enforcement officers and individuals.
2. The information included in this affidavit is provided for the limited purpose of establishing probable cause that David Glenn Perez Jr. (“David”) committed the offense of Sexual Abuse on or about July 10, 2023, in violation of 18 U.S.C. § 2242(2) and committed the offense of Abusive Sexual Contact on or about June 8, 2024 and therefore it does not contain all of the facts known to me.

Additionally, unless otherwise noted, wherever in this affidavit I assert that an individual made a statement, that statement is described in substance herein and is not intended to be a verbatim recitation of such statement.
3. Affiant learned through the course of the investigation that David Glenn Perez Jr. had sexual intercourse with the 31-year-old victim, C.P. (“V1”) when V1 was intoxicated and sleeping.
4. V1 told police that she had been staying with David and her boyfriend, Blake

Wilson, for some time before the incident. V1 said that immediately upon realizing what was happening, V1 left David's room. V1 said that on the way out of the room, David said "you wanted it."

5. At that time, V1 was incredibly upset. Within a short period of time, while still upset and excited, V1 talked to Blake Wilson about what happened. According to Wilson, V1 said that V1 woke up to the David having sex with her. V1 told police she remembered David being in the bed with her with his pants down and that he was naked from the waist down.
6. V1 also told police that the day before the incident David grabbed V1's arm while she was trying to clean his house and he attempted to pull her onto a couch.
7. A witness that asked to remain anonymous ("Anonymous") told police that after the sexual assault incident David told Anonymous that David had sex with V1, but that it was consensual. When Anonymous told David that it wasn't right, David said he wasn't the first person to do something like that (meaning have sex with his daughter). David told Anonymous that V1 was the aggressor with regard to the sex. According to Anonymous, David said he went to bed in his bedroom and then V1 came in the room. David said he didn't know who it was that came in the room but David knew the sex was consensual. David said he didn't realize it was his daughter until the sex was over and then they were

both sick to their stomachs. Anonymous said he/she would testify in court about this if necessary.

8. The police, however, interviewed David after this and David claimed that he never has sex with V1.
9. Mary Perez, suspect's sister, told the police that 2 or 3 years earlier suspect said to her "What, you want to see me fuck my sister?" Suspect then walked up to her and laid her down on a couch. Mary physically resisted David and was able to avoid being sexually assaulted.
10. A.W., the nephew of David, ("V2") told police that on June 8, 2023, David was the passenger in a vehicle driven by V2. When they got to the David's house the suspect moved towards V2. V2 thought David was going to give V2 a hug. Instead, according to V2, David grabbed V2's thigh "really hard" and then grabbed ahold of V2's genitals for 30 seconds to a minute.
11. According to V2, V2 told David to stop but David just laughed it off. V2 said suspect grabbed and manipulated V2's genitals, therefore, V2 believes the sexual touching was done intentional.
12. V2 also told police that David did something very similar to him about a year earlier where David forcefully grabbed V2 genitals.

13. Counts one and two both happened on the Isabella reservation in Indian country and Affiant knows that David Perez Jr. is an Indian.

14. Based on the above-described information, there is probable cause to believe that on or around July 10, 2023, David Glenn Perez Jr. committed sexual abuse in violation of 18 U.S.C. §§ 2242(2) and 1153 and that on or about June 8, 2024, Perez also committed abusive sexual contact in violation of 18 U.S.C. §§ 2244(a)(1) and 1153.



Off. Nick Diedrich, BIA

Sworn to before me and signed in my presence, and/or by reliable electronic means, on this 12 day of June 2024.



HON. PATRICIA T. MORRIS
United States Magistrate Judge